

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION

THIS DOCUMENT RELATES TO:

TRACK THREE

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

DEFENDANTS' PROPOSED QUESTIONS FOR VOIR DIRE

Pursuant to the Court's directive (Dkt. 3758 at II(b)(3)), Defendants request that the Court consider adding the following questions to the Court's *voir dire* examination of the jury panel:

1. Have any of you had a negative experience with any pharmacy?
2. This is a case brought by Lake County and Trumbull County; if the counties fail to prove their case, would you be able to find against them even though you may live in one of those counties?
3. Do you think that even though the burden is on the plaintiffs to prove their case, the defendants should have to prove they did nothing wrong?
4. Is there anyone on the jury panel who thinks that opioid medications cannot ever be used safely?
5. Having now heard something about this lawsuit, is there anyone who has any experience, knowledge, opinions or feelings that may be relevant to the issues in this case?
6. There are several separate and distinct defendants named in this case – when considering the questions you will be asked to decide, is there anyone here who would have difficulty

considering the evidence as to each separate defendant, or who would be unwilling or unable to give separate consideration to each defendant, rather than grouping the defendants together?

Dated: August 9, 2021

Respectfully submitted,

/s/ Kaspar J. Stoffelmayr

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that the foregoing motion was served via the Court's ECF system to all counsel of record on August 9, 2021.

/s/ Kaspar J. Stoffelmayr

Kaspar J. Stoffelmayr